

## Thorlabs UK Modern Slavery Act Transparency Statement 2022

This statement is made pursuant to Section 54 of the United Kingdom (UK) Modern Slavery Act 2015 (“the Act”) to identify actions Thorlabs Inc. and its UK subsidiary, Thorlabs Ltd. (collectively, “Thorlabs”) have taken during the financial year ending December 31, 2021 to prevent slavery and human trafficking in our supply chain or our organisation.

### **1. Thorlabs Structure and Supply Chains**

Thorlabs is a vertically integrated designer, manufacturer and seller of a broad range of photonics products, including laser and fibre optic systems, opto-mechanical components, optics and telecom test instrumentation. As of December 2021, Thorlabs had approximately 2000 employees and operated in 9 countries. Thorlabs has a global vendor base of approximately 5,000 supply chain relationships.

### **2. Thorlabs Values and Policies**

Thorlabs has an extensive range of business policies, processes and procedures which confirm Thorlabs’ commitment to conducting its business in an ethical, legal, environmentally sustainable and socially responsible manner. These policies are embedded in the Thorlabs Code of Conduct and General Terms of Purchase. Thorlabs suppliers are subject to the Code of Conduct and General Terms of Purchase thereby ensuring our suppliers are committed to the same legal, ethical and socially responsible values as Thorlabs. The Thorlabs Code of Conduct and Terms of Purchase are available at <https://www.thorlabs.de/suppliers.cfm>.

### **3. Due Diligence in Assessing Modern Slavery Risk in Operations or Supply Chains.**


Supply chain auditing has been conducted since 2017 based on spend and risk analysis. In the event that risks are identified, Thorlabs works with the supplier to educate them and remove the risk. Due to the Covid situation, on site supplier audits have been suspended for the past 2 years. As we move into a more normal operating environment, we will reintroduce on site auditing.

The following activities form our Modern Slavery risk mitigation measures:

- Training of key personnel in the business.
- Information and education of our supplier base.
- Risk analysis based on manufacturing location and commodity.
- Risk analysis based on top down spend.
- Supplier audits are undertaken and score cards are completed.
- Supplier pre-use questionnaires include questions regarding compliance with the Act.

All significant UK suppliers have received an updated self-assessment questionnaire in 2022.

This statement has been approved by the Board of Directors of Thorlabs Inc., the parent company of Thorlabs Ltd.



Jennifer Cable  
Director and President  
Thorlabs Inc.